

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

UNITED STATES OF AMERICA

v.

RACHEL BURGESS

CR. NO.:

3:18-405

18 U.S.C. § 1952(a)(3)

18 U.S.C. § 2

18 U.S.C. § 1349

18 U.S.C. § 1346

18 U.S.C. § 1343

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)

INDICTMENT

THE GRAND JURY CHARGES:

1. While employed at the South Carolina Department of Corrections, the Defendant **RACHEL BURGESS** accepted bribes to smuggle contraband - including cellphone, cellphone accessories, and narcotics - into a SCDC institution for inmates.

COUNT 1

(Use of Interstate Facility to Facilitate Bribery)

2. In or around October 2015 through April 2016, in the District of South Carolina, the Defendant **RACHEL BURGESS** used a facility in interstate commerce, with intent to promote,

establish, carry on, and facilitate unlawful activity; to wit,

- a. bribery in violation of SC Code §8-13-705; that is, Defendant **RACHEL BURGESS**, directly and indirectly, knowingly accepted, received, and agreed to receive something of value as a public official in South Carolina for himself and another in return for being influenced in the discharge of his official responsibilities; and
- b. bribery in violation of SC Code §16-9-220; that is, Defendant **RACHEL BURGESS** corruptly accepted something of value and a promise to supply something of value as an officer in South Carolina for his benefit in exchange for the improper use of the power of his position;

and thereafter performed and attempted to perform an act to promote, establish, carry on, and facilitate the unlawful activity. All in violation of Title 18, United States Code, Sections 1952(a)(3) and 2.

COUNT 2
(Honest Services Wire Fraud Conspiracy)

2. In or around October 2015 through April 2016, in the District of South Carolina, the Defendant **RACHEL BURGESS** knowingly did conspire and agree with others known and unknown to devise and intend to devise a scheme and artifice to defraud and deprive South Carolina, and its citizens, of the right to honest and faithful services of **RACHEL BURGESS** through bribery and to knowingly and intentionally transmit and cause to be transmitted by means of wire communication in interstate commerce signals, signs, and sounds for the purpose of executing such scheme and artifice. All in violation of Title 18, United States Code, Sections 1349, 1346, and 1343.

COUNT 3
(Possession with Intent to Distribute Narcotics)

3. On or about March 26, 2016, in the District of South Carolina, the Defendant **RACHEL BURGESS** knowingly and intentionally did possess with intent to distribute marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

A True Bill

[REDACTED]

FOREPERSON

Beth Drake

BETH DRAKE (jnr)

UNITED STATES ATTORNEY